

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

JOHN D. CERQUEIRA,

Plaintiff,

v.

AMERICAN AIRLINES, INC.,

Defendant.

Civil Action No: 05-11652-WGY

**PLAINTIFF JOHN D. CERQUEIRA'S
SUPPLEMENTAL MOTION FOR ATTORNEYS' FEES AND COSTS**

Pursuant to 42 U.S.C. § 1988, Mass. Gen. Laws ch. 151B, §9, and Fed. R. Civ. P. 54(d)(2), Plaintiff John D. Cerqueira respectfully submits this Supplemental Motion for Attorneys' Fees and Costs. After prevailing at his trial on his claims under 42 U.S.C. § 1981 and Mass. Gen. Laws ch. 272 § 98 against American Airlines, Inc. ("AA"), Mr. Cerqueira filed a Motion for Attorneys' Fees and Costs, seeking an award of \$524,544.75 in fees, enhanced in any amount the Court deems appropriate, and \$19,299.06 in costs (Doc. 111). That Motion, however, did not take into account work, and costs associated thereto, performed after the trial, including responding to post-trial motions and preparing the previously filed fee petition. In submitting this Supplemental Motion, Mr. Cerqueira requests a total award of \$593,792.25 in fees, enhanced in any amount the Court deems appropriate, and \$20,517.56 in costs.

In support of his Supplemental Motion, Mr. Cerqueira relies on the accompanying Memorandum as well as the following materials:

- 1) Supplemental Declaration of David S. Godkin; and
- 2) Supplemental Declaration of Michael T. Kirkpatrick.

WHEREFORE, Mr. Cerqueira respectfully requests that his Motion for Attorneys' Fees and Costs be allowed and that Defendant be ordered to pay \$593,792.25 in attorneys' fees, enhanced in any amount the Court deems appropriate, and costs in the amount of \$20,517.56.

Dated: March 2, 2007

Respectfully submitted,

JOHN D. CERQUEIRA,

By his attorneys,

/s/ David S. Godkin
David S. Godkin (BBO #196530)
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CERTIFICATE OF SERVICE

I, David S. Godkin, Esq., hereby certify that a true and correct copy of the foregoing document was delivered to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent those indicated as non-registered participants on March 2, 2007.

/s/ David S. Godkin
David S. Godkin

Michael T. Kirkpatrick, Esq.
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ATTORNEYS FOR PLAINTIFF

L.R. 7.1 (A)(2) CERTIFICATION

Pursuant to L.R. 7.1 (A)(2), I, Darleen F. Cantelo, hereby certify that on March 2, 2007, I conferred in good faith with counsel for American Airlines, Inc. regarding this motion in an attempt to narrow or resolve the issues presented.

/s/ Darleen F. Cantelo
Darleen F. Cantelo